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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* ALL PAPERS SHALL BE FILED IN THE  
LEAD CASE, NO. 19-30088 (DM).*

Case Nos. 19-30088 (DM) (Lead Case)  
(Jointly Administered)

**DECLARATION OF PETER J.  
BENVENUTTI IN SUPPORT OF  
REORGANIZED DEBTORS' OPPOSITION  
TO MOTION TO ALLOW/DEEM TIMELY  
LATE FILING OF PROOF OF CLAIM BY  
CSAA INSURANCE EXCHANGE**

Date: October 28, 2020  
Time: 10:00 a.m. (Pacific Time)  
Place: **(Telephonic or Video Only)**  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 I, Peter J. Benvenuti, hereby declare that the following is true and correct to the best of my  
2 knowledge, information, and belief:

3 1. I am partner of Keller Benvenuti Kim LLP, co-counsel to PG&E Corporation (“**PG&E**  
4 **Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors  
5 (collectively, “**PG&E**” or the “**Debtors**” or as reorganized pursuant to the Plan (as defined below), the  
6 “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”). I submit  
7 this Declaration in support of the *Reorganized Debtors’ Opposition to Motion to Allow/Deem Timely*  
8 *Late Filing of Proof of Claim by CSAA Insurance Exchange* (the “**Opposition**”),<sup>1</sup> filed  
9 contemporaneously herewith.

10 2. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon  
11 my personal knowledge. If called upon to testify, I would testify competently to the facts set forth in  
12 this Declaration.

13 3. Attached hereto as **Exhibit A** is a true and correct copy of an exchange of e-mails I had  
14 with counsel for CSAA on September 30 and October 2, 2020. It includes, in the October 2 e-mail from  
15 CSAA’s counsel, a “cut and paste” of a March 25, 2019 e-mail from Laura Brown to Laura Young and  
16 others that is referenced in paragraph 8 of Ms. Brown’s declaration filed on September 25, 2020 [Dkt.  
17 No. 9140].

18 4. Attached hereto as **Exhibit B** is a true and correct partial copy of the Certificate of Service  
19 of Herb Baer, filed on July 23, 2020 at Docket No. 3159 (the “**Bar Date Certification**”). This exhibit  
20 includes the certificate itself and those pages of Exhibits D and E to the certificate that include references  
21 to CSAA or AAA. The pages of the Exhibit are numbered sequentially (1 – 16) in the upper right corner  
22 of each page.

23  
24  
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26  
27  
28 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in  
the Opposition.

1 I declare under penalty of perjury, as set forth in 28 U.S.C. § 1746, that the foregoing is true and  
2 correct to the best of my knowledge, information, and belief. Executed this 21st day of October, 2020,  
3 in Oakland, California.

4 /s/ Peter J. Benvenutti  
Peter J. Benvenutti